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August 21, 2025

Karen Mitchell, Clerk
United States District Court for the
Northern District of Texas
1100 Commerce Street
Dallas, TX 75242

via e-file

Re: Cause No. 3:25-CV-01748-G-BT; *Ryan Woodson vs. Jeffrey Woodson, et al.*; In the USDC for the Northern District of Texas Dallas Division

Dear Clerk:

Enclosed please find for filing Defendant Marriott International Inc.'s Motion for Summary Judgment and proposed Order.

Thank you for your assistance in this matter.

Best regards,

/s/ J. Kevin Carey

J. Kevin Carey

letter clerk1 - msj.wpd
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cc w/enc:

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Dallas, TX 75230

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RYAN WOODSON, §
Plaintiff, §
§
v. § CIVIL ACTION NO. 25-CV-01748
§
JEFFREY WOODSON, an individual; §
KATHERINE WOODSON, an individual; §
GAYLE MORRIS, an individual; CITY §
OF DALLAS; DALLAS POLICE §
DEPARTMENT; MARIELLE §
LEMASTERS, an individual; WILLIAM §
LEMASTERS, an individual; DAVID §
LEE, an individual; EDGARDO GARCIA; §
DARYL BARCLAY; AMAZON §
SERVICES LLC; BDT CAPITAL §
PARTNERS LLC; MARRIOTT §
INTERNATIONAL, INC.; SNL §
ASSOCIATES, INC.; and DOES 1 §
through 20, inclusive, §
Defendants. §

DEFENDANT MARRIOTT INTERNATIONAL, INC.'S
MOTION FOR SUMMARY JUDGMENT

Marriott International, Inc., Defendant herein, files this, its' Motion for Summary Judgment as follows:

I.

Plaintiff's Allegations

1. On October 29, 2024, Plaintiff Woodson filed his original petition claiming a wide variety of claims against his mother and father, the City of Dallas, Dallas Police Department, a variety of Corporations, among others. In paragraph 23 of Plaintiff's

complaint, Plaintiff alleges that he, "believes that JEFF WOODSON, KATHERINE WOODSON, MORRIS, LEMASTERS, Laufer, Hixson, and others involved in meth trafficking through the federally indicted The Order cult, aka The Kingston Clan, the Mormon church, and/or the Church of Scientology and are associated with the drug cartels the Knights Templar, Gomez Martinez Cartel, Martin-Story gang, Sinaloa cartel, and other drug cartels."

2. Plaintiff's allegations against Defendant Marriott International, Inc. arise from a claim that Plaintiff allegedly staying at a Fairfield Inn in Dallas, Texas and that the room Plaintiff was placed, was adjacent to the a room containing members of the Morris family who Plaintiff alleges in involved in an elaborate conspiracy to stalk, harm and possible kill Plaintiff.

II.

FRCP 56

3. "A party may move for summary judgment, identifying each claim or defense—or the part of each claim or defense—on which summary judgment is sought. The court shall grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." Fed. R. Civ. Proc. 56.

III.

Summary Judgment

4. Defendant Marriott International, Inc. denies all of Plaintiff's allegations against Defendant Marriott International, Inc.

5. Moreover, Defendant Marriott International, Inc. is not a proper party

because:

- A. Marriott International, Inc. did not own the premises where Plaintiff alleges an incident occurred in.
- B. Marriott International, Inc. did not operate the subject premises where Plaintiff alleges an incident occurred in.
- C. Marriott International, Inc. did not manage the employees at the subject premises where Plaintiff alleges an incident occurred in.
- D. Marriott International, Inc. did not hire, train, or employ the employees at the subject premises where Plaintiff alleges an incident occurred in.

Please see **Exhibit A**, the Affidavit of Spencer Brooks.

6. Defendant Marriott International, Inc. cannot possibly be held liable for any of the allegations made against it, as reflected in Plaintiff's Original Petition. Therefore, Defendant Marriott International, Inc. is entitled for its Motion for Summary Judgment to be granted as a matter of law.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that the Court grant its Motion for Summary Judgment and dismiss Defendant Marriott International, Inc. with prejudice, as well as all other and further relief to which it may show itself justly entitled.

Respectfully submitted,

/s/ J. Kevin Carey

J. KEVIN CAREY
State Bar No. 03791930

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was sent as indicated below on this 19th day of August, 2025.

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/s/ J. Kevin Carey
J. Kevin Carey

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RYAN WOODSON,

Plaintiff,

v.

CIVIL ACTION NO. 25-CV-1748

JEFFREY WOODSON, an individual;

KATHERINE WOODSON, an individual;

GAYLE MORRIS, an individual; CITY

OF DALLAS; DALLAS POLICE

DEPARTMENT; MARIELLE

LEMASTERS, an individual; WILLIAM

LEMASTERS, an individual; DAVID

LEE, an individual; EDGARDO GARCIA;

DARYL BARCLAY; AMAZON

SERVICES LLC; BDT CAPITAL

PARTNERS LLC; MARRIOTT

INTERNATIONAL, INC.; SNL

ASSOCIATES, INC.; and DOES 1

through 20, inclusive,

Defendants.

AFFIDAVIT OF LOREN NALEWANSKI

Before me, the undersigned authority, personally appeared Loren Nalewanski, who upon his oath deposed and stated as follows:

1. My name is Loren Nalewanski, I am over the age of 18 years, of sound mind, capable of making this affidavit, and I do not have personal knowledge of all the facts recited in herein, however, the information contained herein has been collected and made available to me by others and this Affidavit is true to the best of my knowledge and belief based upon the information made available to me.

2. I am the Managing Vice President of U.S. Franchising, Marriott Select Brands. My business address is 7750 Wisconsin Ave., Bethesda, MD 20814. I oversee and manage contractual relationships with Marriott franchisees, including the Fairfield Inn & Suites Brand.

3. Marriott is the franchisor of hotels located throughout the United States and internationally. As franchisor, Marriott licenses the use of the Marriott trademark and other related trademarks and service marks to franchisees who own and operate the hotels.

4. Marriott International, Inc. did not own the premises where Plaintiff alleges an incident occurred.

5. Marriott International, Inc. did not operate the premises where Plaintiff alleges an incident occurred.

6. Marriott International, Inc. did not manage the employees at the subject premises where Plaintiff alleges an incident occurred.

7. Marriott International, Inc. did not hire or employ the employees at the subject premises where Plaintiff alleges an incident occurred. Marriott did not have a right to supervise any employees at the subject premises.

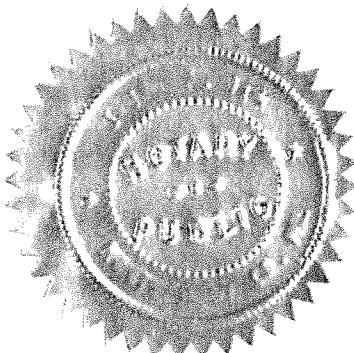
8. Marriott International, Inc. licensed its name to Love's Hospitality, LLC, the owner of the subject premises, pursuant to a franchise agreement.

SIGNED this 8th day of August, 2025.

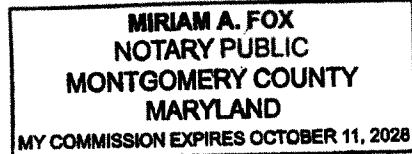


Loren Nalewanski

SUBSCRIBED AND SWORN TO BEFORE ME by the said Loren Nalewanski, on this
the 8th day of August, 2025.



Miriam A. Fox
Notary Public, State of Maryland



IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RYAN WOODSON, §
Plaintiff, §
§
v. § CIVIL ACTION NO. 25-CV-01748
§
JEFFREY WOODSON, an individual; §
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DARYL BARCLAY; AMAZON §
SERVICES LLC; BDT CAPITAL §
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INTERNATIONAL, INC.; SNL §
ASSOCIATES, INC.; and DOES 1 §
through 20, inclusive, §
Defendants. §

ORDER ON DEFENDANT MARRIOTT INTERNATIONAL, INC. 'S
MOTION FOR SUMMARY JUDGMENT

On this day, came on to be considered, Defendant Love's Marriott International, Inc.'s Motion for Summary Judgment, and this Court, after considering all of the evidence and pleadings properly and timely filed, the arguments of counsel, and the applicable law, is of the opinion that Defendant Marriott International, Inc.'s Motion for Summary Judgment is meritorious and should be **granted**.

IT IS THEREFORE, ORDERED, ADJUDGED and DECREED that Defendant Marriott International, Inc.'s Motion for Summary Judgment is **GRANTED** in all respects.

Signed this _____ day of _____, 2025.

Judge Presiding